

EXHIBIT 13

The
AMERICAN
HERITAGE®

Guide to
Contemporary
Usage *and* Style

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phrases introduced by *every*, *any*, and certain uses of *some*. These expressions invariably take a singular verb: *Every car has* [not *have*] *been tested*. *Anyone is* [not *are*] *liable to fall ill*. But when a sentence contains a pronoun that refers to a previous noun phrase introduced by *every*, grammar and sense pull in different directions. The grammar of these expressions requires a singular pronoun, as in *Every car must have its brakes tested*, but the meaning often leads people to use the plural pronoun, as in *Every car must have their brakes tested*. The use of plural pronouns in such cases is common in speech, but it is still widely regarded as incorrect in writing.

The effort to adhere to the rule causes complications, however. The first is grammatical. When a pronoun refers to a phrase containing *every* or *any* that falls within a different independent clause, the pronoun cannot be singular. Thus it is simply not English to say *Every man left; he took his raincoat with him*. Nor is it grammatical to say *No one could be seen, could he?* If the plural forms seem wrong in these examples (*Every man took their raincoat with them*), one way around the problem is to rephrase the sentence so as to get the pronoun into the same clause (as in *Every man left, taking his raincoat with him*). Another is to substitute another word for *every* or *any*, usually by casting the entire sentence as plural, as in *All the men left; they took their raincoats with them*.

The second complication is political. When a phrase introduced by *every* or *any* refers to a group containing both men and women, the choice of pronoun bespeaks an approach to sexism in language and hence to sexual politics in general. Consider the example *Every person in this office must keep track of his* [*her? his or her? their?*] *own expenses*. This matter is discussed in greater detail at the entry for the pronoun *he*.

See more at **all**, **any**, **each**, **either**, **neither**, **none**, and **subject and verb agreement**.

everyplace / anyplace / someplace / no place

The adverbial forms *everyplace* (or *every place*), *anyplace* (or *any place*), *someplace* (or *some place*), and *no place* are widely used in speech and informal writing as equivalents for *everywhere*, *anywhere*, *somewhere*, and *nowhere*, as in *I didn't see them anyplace*. These usages may be well established, but they are not normally used in formal writing.

The two-word expressions *every place*, *any place*, *some place*, and *no place*, when used as nouns, are a different matter. They have the meanings “every (any, some, no) spot or location,” as in the phrase *at every place and time*. Such phrases are entirely appropriate at all levels of style.

evoke / invoke

To *evoke* something is to draw out or call to mind a mental image, state of mind, or memory of something: actions can evoke mistrust, songs can evoke memories, a novel can evoke a bygone era. The result of evoking something is always a new psychological state; to describe something that can bring on such a state we can use the related adjective *evocative*.

To *invoke* something is to call on it and bring it to bear on the situation at hand: a lawyer may invoke a courtroom procedure, a conjurer might invoke the power of a spirit, a computer program can invoke a subroutine. Thus *invoke* results not in a psychological change but the activation of something outside the mind, usually by means of words.

evolution / natural selection

These two terms are commonly but improperly used as synonyms, and their meanings in the field of evolutionary biology are distinct. *Evolution* refers to inheritable changes in the structure and physiology of organisms, changes that develop over the course of generations. There are in fact multiple theories of evolution, but all current theories assume that changes in genetic makeup are largely responsible for changes within species and for the creation of new species over time.

There are many interesting questions regarding what conditions these changes, and the theory of *natural selection* is one very significant piece of the puzzle. It posits that whatever the source of genetic change, only certain changes are likely to be passed down to the next generation: those changes that enhance or at least do not impair the ability of the organism to survive and reproduce. Genetic changes that lower the organism's chance of survival are less likely to be passed on to the next generation and are thereby eliminated from the species' genetic makeup.

Natural selection is thus an important part of most theories of evolution, but is not itself a complete theory of evolution, and most evolutionary biologists agree that many other factors are at work influencing the evolution of life.

ex-

The prefix *ex-* comes from Latin *ex-*, *e-*, meaning "out of, from." It usually occurs with base forms that come from Latin verbs. Thus combining *ex-* with the Latin verb *tendere*, "to stretch," gives us *extend*, "to stretch out." Similarly, in *express*, *ex-* combines with the base form *press*, which comes from the verb *premere*, "to squeeze." So when we express ourselves, we "squeeze out" our thoughts. When followed by *f*, *ex-* becomes *ef-*, as in *efface*. Sometimes *ex-* takes the form of *e-*, as in *emit* (from Latin *mittere*, "to send"). Today *ex-* only forms new words when it means "former," and it is always followed by a hyphen: *ex-President*.

except See **nothing** and **pronouns, personal**.

exceptionable / exceptional

Exceptionable and *exceptional* are not interchangeable. Only *exceptionable* means "objectionable" or "causing disappointment":